

**IN THE UNITED STATES DISTRICT COURT FOR  
THE SOUTHERN DISTRICT OF OHIO**

WILD GOOSE ENTERPRISES, INC.

\*

Plaintiff,

\*

v.

\*

Case No.: 3:20-CV-00340

IRON FLAME TECHNOLOGIES,  
INC.,

\*

\*

Defendant.

\*

\* \* \* \* \*

**MOTION FOR LEAVE TO WITHDRAW AS COUNSEL**

Undersigned counsel respectfully request this Court permit their withdrawal from representation of the Iron Flame Technologies, Inc. ("Defendant"). In support of this motion, undersigned counsel state as follows:

1. Undersigned are Defendant's Maryland-based lead counsel (Stuart M.G. Seraina, Rignal W. Baldwin V, and BaldwinLaw, LLC.) ("Counsel") and Ohio local counsel (Reuel D. Ash and Ulmer & Berne LLP).

2. Counsel entered their appearance on behalf of the Defendant in August 2020 and have diligently complied with their duties throughout the litigation.

3. Counsel and Defendant have since experienced irreconcilable differences that make continued representation untenable for undersigned counsel.

4. Defendants are aware of Counsel's desire to withdrawal and do not oppose the motion.

WHEREFORE, Undersigned counsel respectfully request that this Honorable Court enter an order allowing Stuart M.G. Seraina, Rignal W. Baldwin V, BaldwinLaw, LLC., Reuel D. Ash and Ulmer & Berne LLP, to withdraw from representation of Iron Flame Technologies, Inc. in this case.

Respectfully submitted,

s/Stuart M.G. Seraina

Stuart M.G. Seraina,  
CPF No. 9912160145  
sseraina@baldwin-seraina.com  
Rignal W. Baldwin V,  
CPF No. 12110046  
rbaldwinv@baldwin-seraina.com  
BaldwinLaw, LLC.  
111 South Calvert Street Suite  
1805 Baltimore, Maryland 21202  
Telephone: (410) 385-5695

*Withdrawing Attorneys*

/s/ Reuel D. Ash

Reuel D. Ash (0055843)  
Ulmer & Berne LLP  
600 Vine Street, Suite 2600  
Cincinnati, Ohio 45202  
Telephone (513) 698-5000,  
Facsimile (513) 698-5001  
[rash@ulmer.com](mailto:rash@ulmer.com)

*Withdrawing Attorneys*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on May 18, 2021, I electronically filed the foregoing with the Clerk of the Court by using the CM/ECF system which will send a notice of electronic filing to all attorneys of record registered with the Court's CM/ECF system. A copy of same will be sent via email to the same.

s/Stuart M.G. Seraina  
Stuart M.G. Seraina,  
CPF No. 9912160145  
sseraina@baldwin-seraina.com  
Rignal W. Baldwin V,  
CPF No. 12110046  
rbaldwinv@baldwin-seraina.com  
BaldwinLaw, LLC.  
111 South Calvert Street Suite  
1805 Baltimore, Maryland 21202  
Telephone: (410) 385-5695

*Withdrawing Attorneys*

/s/ Reuel D. Ash

Reuel D. Ash (0055843)  
Ulmer & Berne LLP  
600 Vine Street, Suite 2600  
Cincinnati, Ohio 45202  
Telephone (513) 698-5000,  
Facsimile (513) 698-5001  
[rash@ulmer.com](mailto:rash@ulmer.com)

*Withdrawing Attorneys*